



1429 Avenue D, PMB 198
Snohomish, WA 98290

425-252-0926
www.pilchuckaudubon.org

January 21, 2013

Mr. Randel Perry
US Army Corps of Engineers; GPT/Custer Spur EIS Co-Lead Agencies
Army Corps of Engineers, Department of Ecology and Whatcom County Council
20 January 2013

Subject: Docket number COE-2012-0016: Proposed Gateway Pacific Terminal coal export
proposal EIS scoping comment

Dear Mr. Perry,

Pilchuck Audubon is a chapter representing over 1200 birdwatchers and conservationists in Snohomish County and Camano Island. As wildlife enthusiasts and stewards we have numerous concerns regarding the proposed Gateway Pacific Terminal and plans to transport coal bound for Asia through our communities and along the shores and estuaries of Puget Sound. We urge the Army Corps of Engineers, the Washington Department of Ecology and the Whatcom County Council to fully consider the biological importance of Puget Sound estuaries in the review process of Gateway Pacific Terminal.

Aquatic vegetation of nearshore ecosystems is an important component of the Puget Sound marine environment. Aquatic vegetation, such as eelgrass (*Zostera marina* and *Z. japonica*), is essential as foraging, refuge and rearing habitat for juvenile salmon, Dungeness crab, shellfish, and stocks of Pacific herring that spawn exclusively along the shoreline. In addition, these nearshore ecosystems support migratory bird populations of the Pacific flyway as well as year-round bird and wildlife populations.

Pilchuck Audubon has conducted Snohomish County Christmas Bird Count surveys for thirty five years. Our results document a decline in Puget Sound area sea and shorebird populations during this period of time. We suggest that it may not be a coincidence that the Cherry Point herring population, an important food staple for Chinook salmon as well as for sea birds, has also been in decline since the 1970's. What was once the largest Pacific herring fishery in the state has been identified by the Washington Department of Fish and Wildlife as a species of concern. Importantly, the Cherry Point herring population has seen decreases in its older generations since the 1990's. Though herring typically live for nine years, a 2010 study of Cherry Point herring shows a disappearance of fish above the age of three years. Larger, older fish contribute more eggs to the ecosystem and thus more viability to endangered salmon, orca and bird populations and vitality to our once abundant fishing fleets.

We at Pilchuck Audubon feel that the building of Gateway Pacific Terminal at Cherry Point to transport coal to fuel competing economies will devastate the remaining nearshore ecosystem with lasting, debilitating consequences throughout the unique environment of Puget Sound and our economies here at home.

Please recognize the impact of an additional 18 coal trains through our communities each day and as many as 500 additional massive coal ships in the waters of Puget Sound and through the Strait of Georgia. There are no hazardous response operations in place to address coal spilled into the waters of Puget Sound nor do the coal ships bound for Asia have tug boat escorts. These ships can carry and burn 2 million gallons of bunker fuel, further polluting our air and acidifying

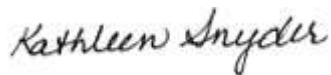
our seas. These ships lack double hulls as protection from oil spills and lack adequate maritime safety records.

The impacts of transporting coal from the Powder River Basin to the Gateway Pacific Terminal are numerous. Our members ask you to consider the immediate and detrimental effects of diesel fumes and soot on our children and homes and the run-off of coal dust into our waters and borne into our air. We ask you to consider the noise of train horns and the effects of increased bluff damage from heavy train traffic into intertidal and nearshore ecosystems. We urge you to consider the disruption to and the livability of our communities that thrive along Puget Sound and ask you not to favor profits of Peabody Energy and Goldman Sachs above regional vitality.

No fewer than nine annual bird festivals are scheduled regionally, bringing tourism and recreational opportunities to our community centers, wildlife areas, and marinas. Outreach and recreational events of Pilchuck Audubon include the signature Puget Sound Bird Fest held each September in Edmonds and our support of the annual Port Susan Snow Goose and Birding Festival of Stanwood. Port Susan and Skagit Bay were recently included in the Western Hemisphere Shorebird Reserve Network, a designation recognizing the importance of these bays as a Site of Regional Importance and a key habitat of international importance to migratory birds. Attendance at our festivals as well as outreach capabilities and logistical planning will be compromised by mile-long coal trains, severing access to beaches, fishing piers and marinas.

Pilchuck Audubon urges you to consider all potential environmental impacts in the review process and to conduct a regional Environmental Impact Statement to assess the cumulative effects on the ecosystems and communities of the Puget Sound region.

Sincerely,

A handwritten signature in cursive script that reads "Kathleen Snyder". The ink is dark and the signature is fluid.

Kathleen Snyder, President